REMARKS

In response to the Office Action dated November 16, 2004, 1, 2, 7, 13 and 20 have been amended. Claims 1-20 are in the case. The Applicants respectfully request reexamination and reconsideration of the present application.

Record is made of a telephonic phone call from Applicants' attorney Edmond A. DeFrank to Examiner Y. Gerezgher. The Office Action of November 16, 2004, the cited references and the pending claims were discussed. A proposed amendment modifying the independent claims was mentioned during the call. The above amendments to the claims reflect the topic mentioned during the call made by the Applicants' attorney.

The Office Action rejected claims 1-20 under 35 U.S.C. § 112, second paragraph.

In response, the Applicants have amended the claims as suggested by the Examiner to overcome these rejections.

The Office Action rejected claims 1-20 under 35 U.S.C. 102(e) as allegedly being anticipated by Raghunathan et al. (U.S. Publication No. 20020120716 A1).

The Applicants respectfully traverse this rejections based on the amendments to the claims and the arguments below.

Applicants respectfully submit that Raghunathan et al. does not disclose all of the claimed features in the independent claims. For example, the independent claims of the Applicant's claimed invention includes receiving the data in parallel and demultiplexing the data into separate data units, assigning and binding a thread to an available socket, releasing the socket as soon as the data has finished transferring and reusing at least one socket and allowing the thread to serve at least one socket and transmit data through the thread's corresponding socket in parallel.

In contrast, Raghunathan et al. disclose a database server that "...stores data in a hierarchical manner...In one embodiment...one or more clients requests are made to a server for data stored...The requests are separated into smaller units. Each smaller unit is then serviced in the order it is received. Thus, each client gets a more balanced distribution of services to its requests (i.e., one request is not completely fulfilled while others wait and remain unfulfilled)" (see Abstract of Raghunathan et al.). This is very different from the Applicant's claimed invention which receives the data in parallel and

7

demultiplexes the data and releases the socket as soon as the data has finished transferring and reuses the released sockets for allowing the thread to serve the sockets and transmit data through the thread's corresponding sockets in parallel.

Although Raghunathan et al. separates client requests, Raghunathan et al. makes units smaller for balancing distribution of services. This is because the server in Raghunathan et al. is a database server and not a multi-application server like the Applicant's invention that includes various applications and not just database applications.

Next, the Examiner argued that Raghunathan et al. disclose "a socket pool" and "a plurality of threads" and where "...each one of the threads from the pool of threads monitoring data request in the pool of sockets where each thread from the thread pool was assigned and connected with one of the available sockets in the pool of sockets..." Also, the Examiner argued that Raghunathan et al. discloses that "...a transaction manager module managing transmitting data in parallel using the pluralities of sockets and the pluralities of threads..." However, this is very different from the Applicant's assigning threads to available sockets and releasing respective sockets as soon as the data has finished transferring and reusing the released sockets.

In addition, the Examiner argued that Raghunathan et al. discloses "no socket engages a worker thread for too long", which means the socket will be held for some period of time in Raghunathan et al. In particular, Raghunathan et al. does not release sockets as soon as the data has finished transferring, like the Applicant's claimed invention. Instead, as disclosed in paragraph [0068] of Raghunathan et al., the "...thread reading a socket gets stalled after a certain length of time because the server fails. By reading just one envelope at a time before moving on, if there are other envelopes in the queue there is a possibility that different (and maybe more) envelopes may be read before the server fails..."
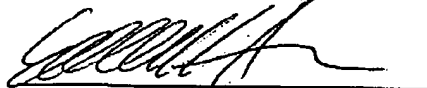
In contrast, in the Applicant's claimed invention, the socket is released as soon as the data has finished transferring. This allows the Applicant's multi-threaded, multi-socketed invention to be scalable by having both the transmission and reception of data by the server parallelized, unlike the database specific system in Raghunathan et al.. Since the sockets are reusable in the present invention, transmission of data is

8

achieved by having the threads serve the sockets for transmitting data through the thread's corresponding socket (which is bound to the same usable port) in parallel. Hence, since the cited reference does not disclose all of the elements of the Applicant's claimed invention, the reference cannot anticipate the claims. As such, the Applicant's respectfully submit that the rejection under 35 U.S.C. 102 should be withdrawn.

With regard to the dependent claims, since they depend from the above-argued respective independent claims, they are therefore patentable on the same basis. (MPEP § 2143.03). Also, the other prior art references cited by the Examiner also have been considered by the Applicant in requesting allowance of the dependant claims and none have been found to teach or suggest the Applicant's claimed invention.

In view of the arguments and amendments set forth above, the Applicant respectfully submits that the claims of the subject application are in immediate condition for allowance. Thus, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicants kindly **request** the Examiner to telephone the Applicants' attorney at **(818) 885-1575**.

Respectfully submitted,
Dated: February 16, 2005

Edmond A. DeFrank
Reg. No. 37,814
Attorney for Applicants
(818) 885-1575 TEL
(818) 885-5750 FAX

9